



STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



EDMUND G. BROWN JR.  
GOVERNOR

January 31, 2017

Lori Cox, Director  
Alameda County Social Services Agency  
2000 San Pablo Ave., 4<sup>th</sup> Floor, Suite #445  
Oakland, CA 94612

Dear Ms. Cox:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of August 15 -19, 2016. Enclosed is the final report on the review. We apologize for the delay.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Elsa Vazquez at (916) 654-2110. You may also contact us by e-mail at [crb@dss.ca.gov](mailto:crb@dss.ca.gov).

Sincerely,

*Original signed by Civil Rights Chief*

JIM TASHIMA, Chief  
Civil Rights Unit  
Welfare to Work Division

Enclosure

c: Darleen Brooks, Civil Rights Coordinator

Kim McCoy Wade , Chief  
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT  
FOR  
ALAMEDA COUNTY SOCIAL SERVICES AGENCY  
Conducted on  
AUGUST 15-19, 2016**

**California Department of Social Services  
Human Rights and Community Services Division  
Civil Rights Unit  
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**Reviewers: Elsa Vazquez  
Tiffany Marsh**

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## **CIVIL RIGHTS COMPLIANCE REVIEW REPORT**

### **I. INTRODUCTION**

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRU) staff was to assess the Alameda County Social Services Agency (ACSSA) with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on August 15, 2016 to August 19, 2016. An exit interview was held on August 19, 2016, to review the preliminary findings.

The review was conducted in the following locations:

	<b>Address</b>	<b>Programs</b>	<b>Non-English languages spoken by a substantial number of clients (5% or more)</b>
Oakland Main	401 Broadway, Oakland	Children & Family Services (CFS)	Spanish, Chinese, Vietnamese, Farsi, Cambodian and Tagalog
N. Oakland Self Sufficiency Office	2000 San Pablo Ave, Oakland	CalFresh, CalWORKS, State Hearings	Spanish, Chinese, Vietnamese, Farsi, Cambodian and Tagalog
Eastmont Office	6955 Foothill Blvd, Oakland	Adult & Aging Programs (APS & IHSS)	Spanish, Chinese, Vietnamese, Farsi, Cambodian and Tagalog
Edgewater Office	7751 Edgewater Drive, Oakland	Program Integrity	Spanish, Chinese, Vietnamese, Farsi, Cambodian and Tagalog
South County Eden Area Multi-Service Center	24100 Amador, Hayward	Call Center	Spanish, Chinese, Vietnamese, Farsi, Cambodian and Tagalog

## II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2016-2017 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback.

Bay Area Legal Aid  
1735 Telegraph Ave  
Oakland CA 94612  
(510) 663-4744

East Bay Community Law Center  
3130 Shattuck Ave.  
Berkeley, CA 94705  
(510) 548-4040

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

### Interviews Conducted of Public Contact Staff

<b>Classifications</b>	<b>Total</b>	<b>Bilingual</b>
Eligibility Workers	2	1
Employment Worker	2	0
Children Social Workers	4	2
Adult Program Workers	4	2
Receptionist/Screeners	3	1
<b>Total</b>	<b>15</b>	<b>6</b>

### Program Manager Surveys

Number of surveys distributed	12
Number of surveys received	12

### Reviewed Case Files

English speakers' case files reviewed	8
Non-English or limited-English speakers' case files reviewed	63
Languages of clients' cases	Spanish, Farsi, Cambodian, Chinese, Tagalog, Vietnamese, Mam, Amharic, Tygrinya, Mongolian, Karen, French, Hindi, Japanese, Dari, Korean, and Russian

Sections III through IX of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section X evaluates the county's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII of the report is reserved for a declaration of overall compliance.

### III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

#### A. Findings

<b>Access to Services, Information and Outreach</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Does the county accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	<b>Yes</b>		Clients can mail in applications.
Can applicants access services when unable to go to the office?	<b>Yes</b>		Clients can access services online via MyBenefitsCalWin.org.
Does the county ensure the awareness of available services for individuals in remote areas?	<b>Yes</b>		

<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?		<b>No</b>	In CFS during the staff interviews, one staff stated it is not used in this county unless a child is removed. Another staff stated the



<b>Signage, posters, pamphlets</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
			Pub 13 is not used in this department.
Is the pamphlet distributed and explained to each client at intake and re-certification?	<b>Yes</b>		The pamphlet is included in the intake packets and at re-certification.
Is the current version of Pub 13 displayed in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese?		<b>No</b>	<b>Repeat Finding from 2015.</b> At 2000 San Pablo the current version of the Pub 13 was not displayed.
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?		<b>No</b>	<b>Repeat Finding from 2015:</b> There was no poster stating the Pub 13 is available in all 18 languages.
Was the Pub 13 available in large print (English and Spanish), CD, audiocassette and Braille?		<b>No</b>	At 2000 San Pablo Office, the Pub 13 was not available in Large Print.
Were the current versions of the required posters present in the lobbies?		<b>No</b>	<b>Note:</b> The Pub 86 poster was present; however it did not have the current CRC contact information in designated area.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	<b>Yes</b>		

## B. Corrective Actions

Informational Element	Corrective Action Required
Distribution of CDSS' Pub 13	ACSSA shall ensure that the Pub 13 pamphlet, "Your Rights Under California Welfare Programs" is both given and explained to program participants in all of the programs for which CDSS has oversight responsibility. Div. 21-107.221
Translated Pub 13	ACSSA shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2
Auxiliary aids	ACSSA shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4
Posters	ACSSA shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211 <b>NOTE:</b> Pub 86 is incomplete without current Civil Rights Coordinator information.

## C. Recommendation

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	06/11
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website

<http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

#### IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

##### A. Findings and Corrective Actions

**1. Facility Location: 401 Broadway, Oakland** - No ADA review due to upcoming relocation.

**2. Facility Location: 2000 San Pablo, Oakland**

Facility Element	Findings	Corrective Action
Parking Garage - Access aisle connects to path of travel?	Van accessible space #45, the access path of travel requires clients to travel behind and/or in front of the security booth.	The parking access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) pg. 176  Parking spaces and access aisles shall be designed so that

Facility Element	Findings	Corrective Action
Location of access aisle.	<p>Persons with disabilities are forced to go behind cars.</p> <p>Access aisle does not connect to the accessible path of travel.</p> <p><b>Repeat Finding</b> Van accessible space #68; the access aisle is located on the driver side of the parking space.</p>	<p>persons using them are not required to travel behind parking spaces other than to pass behind the parking space in which they parked. (CA T24 11B-502.7.1) pg. 172</p> <p>Access aisles shall adjoin an accessible route. (CA T24 11B-502.3) (ADA 502.3) pg. 173</p> <p>Access aisles for van parking spaces shall be located on the passenger side of the parking spaces. (CA T24 11B-502.3.4) (ADA 502.3.4) pg. 176</p>
Client lobby Required Poster –	Pub 86 – Poster, did not have the current CRC contact information.	Posters on nondiscrimination provided by CDSS shall be prominently displayed in all waiting rooms and reception areas. The county welfare department shall place on the posters the name, office telephone number, and office address of the person(s) in the CWD who is responsible for processing discrimination complaints. Posters dealing specifically with nondiscrimination in the Food Stamp Program shall be prominently posted in all certification and issuance offices. Div. 21-107.21.211
Accessible client Interview cubicle	Interview Cubicle #1007, designated ADA cubicle does not have International Symbol of	In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and Gates, entrances complying



Facility Element	Findings	Corrective Action
	does not meet ADA language requirements.	<p>off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following:  <b>"Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____."</b> (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 170</p>
Front entrance	There was no International Sign of Accessibility (ISA) at the main entrance.	In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and Gates, entrances complying with Section 33, Doors, Doorways and Gates shall be identified by the International Symbol of Accessibility complying with "International

Facility Element	Findings	Corrective Action
		<p>Symbol of Accessibility” heading in Section 57, Signs &amp; Identification. (CA T24 11B-216.6) (ADA 216.6) pg. 28</p> <p>NOTE: Entrance Signage must be at every primary public entrance at every major junction of an accessible route of travel, indicating the direction along or to accessible features.</p>
Water fountain	Drinking fountain does not comply with the following: Location; clear ground floor space and not in an alcove.	All drinking fountains shall be located completely within alcoves, positioned completely between wing walls, or otherwise positioned so as not to encroach into pedestrian ways. (CA T24 11B-602.9) pg 304
Restroom	Both Men’s & Women’s Restroom do not meet compliance with ADA requirements.	<b>Note:</b> See recommendation below.

#### a. Recommendation

Edgewater Office is not listed as an official public office, however; it does allow for clients and/or their representatives to come to this office to review their case files prior to a hearing. Therefore, it needs to be in compliance with ADA requirements. The following recommendations are being made: there is a Unisex restroom near the IEVS side of the building which could be designated the accessible restroom. It also requires a few other corrections such as; soap dispenser is below the 40” requirement. And, the pipes under the sink need to be rewrapped. If these are corrected, it would meet compliance.

Edgewater office had an excellent display of the Pub 13 in all available languages, the lobby counter had a telephone available to contact Lionbridge and all required posters were present.

**5. Facility Location: 24100 Amador, Hayward – Call Center – Not a public office.**

## **V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE ON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in notices of action (NOA) be in the individuals' primary language.

### **A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews**

Does the county have a language line provider, a county interpreter list, or any other interpreter process?	<b>Yes</b>			ACSSA has a contract with Lionbridge and also has a county employee bilingual roster.
Is there a delay in providing services?	<b>Yes</b>			Staff interviews revealed there can be a 1-2 week delay to obtain an interpreter for MAM language. In CFS, a worker stated for home visits it can take



				an hour to get an interpreter, or immediate if they use the telephone language line. (Depending on the language).
Are county interpreters determined to be competent?	<b>Yes</b>			
Does the county have adequate interpreter services?	<b>Yes</b>			<b>Note:</b> Staff interviews and Program Manager Survey's continue to reveal the need for additional bilingual staff.
Does the county allow minors to be interpreters? If so, under what circumstances?	<b>Yes</b>			In one case reviewed, case comments mentioned a 16 year old daughter was allowed to be an interpreter for their parent.
Does the county allow the client to provide his or her own interpreter?	<b>Yes</b>			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?		<b>No</b>		
Does the county use the CDSS-translated forms in the clients' primary languages?	<b>Yes</b>			During staff interviews it was mentioned for CFS there was a need for more Spanish translated forms.
Is the information that is to be inserted into NOA translated into the client's primary language?	<b>Yes</b>			
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?		<b>No</b>		During Staff interviews it was stated that staff would insert information in English and the client would have to call the worker to have the information translated for them.

Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	<b>Yes</b>			Staff is aware of a TDD, California Relay and ASL interpreters available if needed.
Does the county identify a client with a disability (physical, mental, or learning)?	<b>Yes</b>			Staff interviewed stated they would identify a disability in the CalWin case comments.
Does the county provide reasonable accommodations to clients with a disability (physical, mental, or learning)?	<b>Yes</b>			Staff interviewed stated they would attempt to assist the client or call their Supervisor to help with an accommodation. However, there is no policy or procedure to follow.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	<b>Yes</b>			Staff interviewed stated they would read to the client if needed.
Does the county offer screening for learning disabilities?	<b>Yes</b>			In Welfare to Work.
Is there an established process for offering screening?	<b>Yes</b>			In Welfare to Work there is a process to offer screening and/or make a referral.
Is the client identified as having a learning disability referred for evaluation?	<b>Yes</b>			

## B. Corrective Actions

Area of Findings	Corrective Actions
Bilingual Staff	ACSSA County shall ensure that a sufficient number of qualified bilingual employees shall be assigned to positions and locations serving a substantial number of non-English-speaking persons. Div. 21-115.1
Effective Services	ACSSA must develop and implement a policy that identifies the process to ensure effective services to applicants and recipients who are non-English speaking or who have disabilities. Div. 21-115
Timely Services	ACSSA must ensure that bilingual/interpretive services are prompt and without undue delay. Div. 21-115
Interpreter Services	ACSSA must offer and provide free interpreter services using qualified interpreters. Div. 21-104q(1) and 21-115
Use of Minors	ACSSA shall only allow the use of a minor (under the age of 18 years) to temporarily act as an interpreter under extenuating circumstances or at the specific request of the applicant/recipient. Div. 21-115.16
Written Materials	ACSSA must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS. Div. 21-115.2
Notices of Action	ACSSA county uses translated forms and materials, such as notices of actions that contain spaces in which the county must insert information for the client, such information must be in the primary language of the client. Div. 21-115.2

## VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

### A. Findings from Case File Reviews and Staff Interviews

<b>Documented Item</b>	<b>Adult Programs (IHSS)</b>	<b>CalWORKs &amp; Employment Services</b>	<b>CalFresh</b>	<b>Program Integrity</b>	<b>Children &amp; Family Services (CFS)</b>
Ethnic origin documentation	CMIPS, Application and Face sheet	CalWin case comments	CalWin case comments	CalWin, FRED Form Referral sheet	ER Referral Form
Primary language documentation	CMIPS, Interview Face Sheet	Form 5805	Form 5805	CalWin, FRED Form Referral sheet	ER Referral Form; Case summary. No consistent method used to document.
Method of providing bilingual services and documentation	CMIPS case comments	CalWin case comments	CalWin case comments	Case comments	No consistent method used to document. In some cases it was found in court reports and other cases it was in case comments and some did not have any documentation.
Client provided own interpreter	Case comments	CalWin case comments	CalWin case comments	CalWin case comments	CWS-CMS case comments

<b>Documented Item</b>	<b>Adult Programs (IHSS)</b>	<b>CalWORKs &amp; Employment Services</b>	<b>CalFresh</b>	<b>Program Integrity</b>	<b>Children &amp; Family Services (CFS)</b>
Method to inform client of potential problem using own interpreter	None found	None found	None found	None found	No documentation noted on case
Release of information to Interpreter	None found	None found	None found	None found	None found
Individual's acceptance or refusal of written material offered in primary language	Form 5805	Form 5805, form not consistently used.	Form 5805, form not consistently used.	Case comments	None found
Documentation of minor used as interpreter	None found	None found	None found	None found	16 year old minor was used as interpreter.
Documentation of circumstances for using minor interpreter temporarily	None found	None found	None found	None found	Not documented
Method of identifying client's disability	CMIPS, case narrative	Calwin case comment, not cons	CalWin case comments	CalWin case comments	None found
Method of providing reasonable accommodation to the client with disability	CMIPS case comments,	CalWin case comments; ASL interpreter provided.	None found	Case comments	None found

## B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Temporary use of a minor (under 18 years of age) as an interpreter	<p>When a minor (under 18 years of age) is used as an interpreter, the CWD shall so document the circumstances requiring <u>temporary</u> use of minors in the case record. Div. 21-116.22</p> <p>Only under extenuating circumstances or at the specific request of the applicant/recipient shall a CWD allow a minor (under the age of 18 years) to temporarily act as an interpreter.</p>
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation of primary language	Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin and primary language. Div. 21-201.21
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	ACSSA must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

## VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

### A. Findings

Interview questions	Yes	No	Comments
Do employees receive continued Division 21 Training?		<b>No</b>	In CFS one staff stated they received training during their induction, but have not received training in over two years. Also, another CFS staff mentioned they had not received Civil Rights training at all.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?		<b>No</b>	Staff interviews reflect there is still some uncertainty on the procedure to follow when a client wishes to file a complaint, whether it is a discrimination, program or personnel.
Does the county provide employees Cultural Awareness Training?	<b>Yes</b>		
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	<b>Yes</b>		
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	<b>Yes</b>		
Does the county provide training on how to interact with clients with disabilities (physical, mental & learning)?		<b>No</b>	Staff interviews revealed there is some type of discussion during the Civil Rights training however there is no policy or procedure in place for employees to follow.

## B. Corrective Actions

Training Area	Corrective Action
Division 21, Civil Rights Training	ACSSA shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1

## VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

### A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes		
Did the employees know who the Civil Rights Coordinator is?		No	Four out of Five staff in CFS did not know who the Civil Rights Coordinator was.
Did the employees know the location of the Civil Rights poster with information as to how and where the clients can file a discrimination complaint?	Yes		



<b>Interview and review areas</b>	<b>Yes</b>	<b>No</b>	<b>Findings</b>
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?		<b>No</b>	

## **B. Corrective Action**

<b>Element</b>	<b>Corrective Action</b>
Discrimination Process	ACSSA shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203
Civil Rights Coordinator	ACSSA shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

## **IX. CALL CENTER EVALUATION**

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

### **A. Findings from Call/Service Center site visit and interviews.**

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
Is the Call Center/Service Center publically accessible to clients for walk-in services?		<b>No</b>	
Does the Call Center/Service Center answer calls for the entire county, by district, or regional office?	<b>Yes</b>		

Question	Yes	No	Comments
Does the Call/Service Center have an Interactive Voice Response system?	Yes		
If so, does the Interactive Voice Response system have language options for all county threshold languages?	Yes		
Does the Interactive Voice Response system have an option to request free interpretive services?	Yes		
Is the Call/Service Center accessible to clients with a disability (physical, mental, or learning)?	Yes		
Does the Call/Service Center accommodate clients with a disability (physical, mental, or learning)?	Yes		
Are the Call/Service Center calls monitored for quality assurance?	Yes		
Does the Call/Service Center staff provide services to client's individual case?	Yes		

## B. Observation

The reviewer sat with a call center agent, and observed the staff is equipped with the tools and resources to serve their clients. The access to Lionbridge enables staff to provide the client with an interpreter immediately.

## X. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

**A. Major observations include:**

1. Inadequacy of ACSSA's ADA plan, no policy/procedures outlined for employees to follow for the offer of, and/or provide a reasonable accommodation for client's with disabilities.
2. Language access for the less common languages.

**B. Corrective Actions**

1. ACSSA needs to develop and implement a Reasonable Accommodation (RA) policy & procedure for employee's to follow upon a disabled client's request.
2. Language access for the less common languages needs to be evaluated further to ensure equal access to benefits and services.

**XI. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**

The Alameda County Civil Rights Compliance Plan for the period August 1, 2016 through July 31, 2017, was received on June 28, 2016. Thank you for submitting your agency's Civil Rights Compliance Plan. Before approval, however, we are requesting the following augmentations to your plan:

- a. **Section V. Services to Non-English-Speaking, Limited-English-Proficient and Disabled Applicants/Recipients** - Provide ACSSA's policy and procedure to identify a client's disability (physical or mental).
- b. **Section V. Services to Non-English-Speaking, Limited-English-Proficient and Disabled Applicants/Recipients** - Provide ACSSA'S policy and procedure for a client to file a Discrimination Complaint. **(Repeat Finding)**
- c. **Section V. Services to Non-English-Speaking, Limited-English-Proficient and Disabled Applicants/Recipients** - Provide policy/procedure for when a client fails to self-identify primary language
- d. **Section XII. Discrimination Complaint Procedure** – Discrimination Complaint Procedure needs to be revised as it is not consistent with CDSS CRB Discrimination Guidelines
- e. **Revised Civil Rights Training Module** - revisions were needed to separate client's rights training from employee rights training.

- f. **Section XIII. Discrimination Complaint Log-** Provide copy of Discrimination Log with required data. **Refer to Division 21.203.2.21**

Please submit these items with your corrective action plan for this review.

## **XII. CONCLUSION**

The CDSS reviewer found the Alameda County Social Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Darleen Brooks and Alexandria Bell, Civil Rights Coordinators, for organizing the details of the review, and to Melanie Chadwick, Facilities Manager, who assisted in each of the facility reviews. In each District Office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

During the process of the 2016 review there was an exchange of Civil Rights Coordinators from Ms. Darleen Brooks to Ms. Alexandria Bell. I would like to thank Ms. Darleen Brooks for her commitment as ACSSA's Civil Rights Coordinator.

As the new Civil Rights Coordinator, Ms. Bell came on board well prepared for this review. Ms. Bell immediately recognized a lack in policies and procedures within the Civil Rights Program. Ms. Bell was instrumental in drafting the Client Civil Rights Compliance Policy & Procedure, Client Reasonable Accommodation Policy & Procedure, and revising the Client Discrimination Complaint Form. I look forward to the completion and the implementation of the policies and procedures.

It is apparent that ACSSA is committed to ensure equal access services to its clients; however, at the Exit meeting it was discussed that the infrastructure and the key components of the Civil Rights Program -- Civil Rights Coordinator, Language Coordinator, Client Advocate and the Forms Coordinator -- should have a unified process of collaborating over aspects of the Civil Rights Program for clients.

The CDSS found the Alameda County Social Services Agency in partial compliance, compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Alameda County Social Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with

Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.